

Corporate Social Responsibility Policy

NMTRONICS (INDIA) PRIVATE LIMITED

Approved by the Board of Directors of NMTronics (India) Private Limited

This Corporate Social Responsibility (CSR) policy ("Policy") sets out the objectives and procedures to fulfil the Corporate Social Responsibility requirements to be followed by NMTronics (India) Private Limited, pursuant to the Companies Act, 2013 (as amended from time to time), Corporate Social Responsibility Rules 2014 and Schedule VII of the Companies Act 2013.

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1. Introduction

NMTronics (India) Private Limited (“Company/NMTronics”) is engaged in providing technological solutions to its customers especially in the field of Electronics Manufacturing.

There are many innovations inside our working environment as a true Technology company and working completely in sync with “Make in India” concept of supporting in Electronic Manufacturing. NMTronics believes that this position brings both opportunity and responsibility. NMTronics believes in applying its skills and resources where it can make the greatest impact on the society. This belief is entwined in all the Community involvement programs and the same is accomplished through a skill-based approach, driving meaningful change in the community by establishing a 360o connect by Corporate Social Responsibility (“CSR”) program initiatives.

The Company’s CSR activities revolve around some guiding principles - Impact, Innovation, Integrity, Inclusiveness.

The initiatives taken by the Company is in consonance with projects and programs relating to activities specified under Schedule VII to the Companies Act, 2013 (“Act”) and Section 135 of the Companies Act, 2013.

2. Objectives of the Policy

The main objective of CSR policy is to make CSR a key business process for sustainable development of the society by:

- Driving measurable change in our communities and
- Inspiring our actions as societal change makers and contribute to societal needs by applying our skills and expertise.

3. CSR Committee

Pursuant to sub-section 9 of Section 135 of the Companies Act, 2013 and the amendments thereof vide section 27 of the Companies Amendment Act, 2020, the Company/Board of Directors shall not be required to constitute the Corporate Social Responsibility (CSR) Committee.



Text of Section 135 (9) of the Act as follows:

Section 135 (9): Where the amount to be spent by a company under sub-section (5) does not exceed fifty lakh rupees, the requirement under sub-section (1) for constitution of the Corporate Social Responsibility Committee shall not be applicable and the functions of such Committee provided under this section shall, in such cases, be discharged by the Board of Directors of such company.]

Hence, the CSR committee has been dissolved and functions of CSR Committee now been discharged by the Board of Directors of the Company.

4. Role of Board of Directors

The Board of Directors shall approve the CSR programs for the Company.

- a) To formulate and recommend to the Board of Directors, the CSR Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Act and the applicable Rules;
- b) To recommend CSR activities to be undertaken by the Company or in collaboration with any other entity;
- c) To recommend the amount of expenditure to be incurred on the CSR activities;
- d) To monitor the implementation of the approved CSR activities from time to time.

5. Programs under the Policy

The Company shall undertake CSR activities included in its plan for that year, as recommended and approved by the Board of Directors at the beginning of each year, in accordance with Schedule VII of the Act, and the rules thereof. Also to approve any modification to the existing CSR plan or to propose any new program during the financial year under review.

6. CSR Focus Areas

The Company's CSR will focus on the following thrust areas:

- a) Education



- b) Employability
- c) Women Empowerment
- d) Environmental sustainability
- e) Health and hygiene
- f) Animal welfare
- g) Natural calamity Assistance

Besides the above thrust areas, the Company may also undertake CSR projects or programs pursuant to Schedule VII of the Companies Act, 2013 as detailed in Annexure A to this policy.

7. Budgets and Expenditures

NMTronics Board shall allocate a budget for various identified CSR projects/programs falling within the purview of the objectives of this policy. The CSR expenditure shall include all actual expenditures including contribution to corpus or on project or programs relating to CSR recommended and approved by the Board of Directors within the purview of Schedule VII of the Act.

8. Reporting

The expenditure for the financial year will be tracked by the Board members in its meetings. It is mandatory for NMTronics to disclose its CSR Policy, programs/projects undertaken and the expenditure made towards CSR activity in the Board's report forming part of annual report.

9. Treatment of Surplus

Any surplus generated from CSR projects undertaken by NMTronics in a particular financial year will be tracked and channelized into NMTronics CSR corpus. These funds will be used in development of the CSR projects in the following year and will not be added to the normal business profits.



ANNEXURE A

Core themes	Sub-themes
Healthcare	1. Eradicating hunger, poverty and malnutrition, Indicative activities under eradicating hunger malnutrition in the above category shall include meal programs or providing meals or necessary resources and infrastructure to Non- Governmental Organizations or Bodies for implementation of the above.
	2. Promoting health care including preventive healthcare. The Company intends to support this by providing funds to the needy Hospitals or healthcare centers run by NGOs to acquire healthcare tools, technologies, equipment and support needy people in terms of funding their treatment.
	3. Sanitation including contribution to notified funds set up by the Central government for the purpose of sanitation. Sanitation is one of the primary requirements for a healthy and sustainable society. Recognizing this, the Company will focus on activities that promote sanitation which will ensure better standard of living and health for the society.
	4. Making available safe drinking water. Indicative activities under this will include, collaborating with empanelled NGO's for funding (partly or wholly) the setting up of a plant, to produce safe drinking water and supporting long term supply of safe drinking water.
Education	1. Promoting education including special education and employment enhancing vocational skills especially among Children, women, elderly and differently abled. Indicative programs under this head will include funding of projects, measures or activities by empanelled NGOs to provide education to children including specially-abled children, unemployed youth, adult education and allied activities. Skill development amongst youth and the working age population will also be a thrust area under this thread. Since education is a continuous process, this program will include funding for partial or full construction of school buildings or purchase by the NGO of furniture and other equipment and/ or operational expenses in furtherance of the above processes.
	2. Livelihood enhancement projects. Indicative activities under this head include funding of projects run by NGOs to support development of skill and art of the economically backwards to enhance their livelihood. This will be achieved by funding of proposals to acquire necessary tools, equipment and other materials for implementing the above processes.

Empowerment 1. Promoting gender equality.

As a part of supporting Gender equality in the society, NGOs or other implementing agencies will support projects and activities in furtherance to achieve this objective.

2. Empowering women

Indicative activities for empowerment of women shall include supporting the NGOs which are implementing such programs for skill development, training and livelihood support of women.

3. Setting up home and hostels for women and orphans, old age homes, day care centers including for senior citizens.

Orphans, senior citizens and women rescue from trafficking etc. are vulnerable section of the society that need special support and safeguarding to help them lead a better life. For supporting such requirements, the Company under this head will fund the projects, activities or programs proposed or run by NGOs encompassing setting up and running of orphanages, institutions, child support centers and schools with such special purpose for safeguarding them. Indicative activities will also include funding of operational activities and support infrastructure for the above.

4. Reducing inequality faced by socially and economically backward groups.

Reduction of inequality in all aspects of life will help in better welfare in the society. The Company aims to implement this in tandem with other programs under this CSR policy.

Ecology

1. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources.

Indicative activities under this category will include funding the proposals, activities or projects by NGOs for setting up, running and maintaining shelter homes and veterinary centers for animals. For protection of flora (plants and forests), indicative activities will include supporting NGOs in activities and programs relating to afforestation and environmental sustainability programs.

2. Maintaining quality of soil, air and water including contribution to funds set up by the Central Government for the rejuvenation of the River Ganga.

Indicative activities under this head will include supporting projects, activities and proposals by NGOs working for supporting environment, ecology and sustainability. The Central Government in India has set up certain funds which are utilized for protection and cleaning of the River Ganga which is the largest river in India. Contributions made to the funds for protection of river Ganga are considered as eligible CSR spends.

Government Funds Prime Minister Relief Fund

Contribution to the Prime Minister's national relief fund or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women and contributions to such funds by the Company are considered as eligible CSR spends.

